



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
CITY VIEW PLAZA, SUITE 7000
#48 165 RD. KM 1.2
GUAYNABO, PR 00968-8069
OCT 27 2016

CERTIFIED MAIL /RETURN RECEIPT REQUESTED

Article Number: 7011 0470 0000 5042 2074

Mr. Alvin E. Crespo, Director
Environmental Health and Safety
Bristol-Myers Squibb Manufacturing Company
Humacao Operations
P.O. Box 609
Humacao, Puerto Rico, 00792-1255

Re: Comments on the Technical Review RCRA Corrective Action Program Quarterly Progress Report No. 62 1st Quarter 2016 for the Bristol-Myers Squibb Manufacturing Company, Humacao, Puerto Rico
EPA ID Number: PRD 090021056

Dear Mr. Crespo:

The United States Environmental Protection Agency-Region 2 (EPA) has reviewed the RCRA Corrective Action Program Quarterly Progress Report No. 62, 1st Quarter 2016 (Report), submitted by Bristol-Myers Squibb Manufacturing Company (BMSMC) for its facility in Humacao, Puerto Rico. As part of this review, EPA has also evaluated the RCRA Corrective Action Program Quarterly Progress Reports No. 49 to 59 (i.e., Fourth Quarter 2012 through Third Quarter 2015) and approximately 25% of the associated raw data contained therein (randomly selected).

Enclosed are EPA's comments on these Reports. Please provide your response to all of our comments within 45 days of receipt of this letter. If you have any questions regarding this correspondence, please contact Socorro Martinez of my staff at (787) 977-5886 or via email at martinez.socorro@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Carmen R. Guerrero Pérez".

Carmen R. Guerrero Pérez
Director
Caribbean Environmental Protection Division

Enclosure

cc: Nilda Sanchez Santiago, PREQB

Comments on the RCRA Corrective Action Program
Quarterly Progress Report No. 62 1st Quarter 2016
Bristol-Myers Squibb Manufacturing Company
Humacao, Puerto Rico

I. COMMENTS

1. The March 2016 Release Assessment Report (RAR) identified several new potential constituents of concern (COCs) at Tank Farm Area (SWMU No. 3), the Former Brule Incinerator Area (SWMU No. 9), and the Building 5 Area (SWMU No. 20). The ongoing quarterly groundwater sampling program at these SWMUs should be expanded to analyze for the full list of volatile organic compounds as well as 1,4-dioxane/naphthalene. This revision is necessary to incorporate and evaluate the newly identified COCs. Note that the ongoing quarterly groundwater sampling will also need to be further evaluated and revised for additional SWMUs or COCs as the Release Assessment data becomes available. Finally, these revisions may require that BSMC's RCRA Hazardous Waste Treatment and Storage Permit No. PRD090021056 be modified as necessary.
2. The vapor intrusion sample analytical results are provided in an attachment (Attachment B on CD) and consist of the laboratory summary sheets. It is recommended that BSMC compile the data and provide vapor intrusion sample analytical result tables in the body of the report similar to the data tables provided for the 2015 Groundwater Analytical Results.

Section 2.3, Building 5 Area, Pages 6-7

3. The text indicates that the data from the second round of vapor intrusion sampling in Building 30 and Building 42 from January 2016 can be found in Attachment B. Upon review of Attachment B, the data is actually from the first round of vapor intrusion sampling in Building 30 and Building 42 that was conducted in October 2015. Attachment B should be updated to include the second round of vapor intrusion sampling. Additionally, both rounds of vapor intrusion data should be summarized in the data tables (see General Comment #2) in this progress report.